

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROSA ZAYAS and **EDWIN ZAYAS**, as Parents and
Natural Guardians of **R.Z.**, and **ROSA ZAYAS** and
EDWIN ZAYAS, Individually,

Plaintiff,

1:25-cv-01880

-against-

DECLARATION

MELISSA AVILÉS-RAMOS, in her official capacity
as Chancellor of the **NEW YORK CITY**
DEPARTMENT OF EDUCATION, and the **NEW**
YORK CITY DEPARTMENT OF EDUCATION,

Defendants.

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KENNETH WILLARD, makes the following declaration under penalty of perjury in
support of Plaintiff's Motion for a Temporary Restraining Order:

1. I am a Senior Litigation Attorney at the Liberty & Freedom Legal Group.
2. I have been retained by Plaintiffs to represent them in this matter and am knowledgeable about the facts and circumstances of this case.
3. The following exhibits are true and correct copies of the documents attached therein:
Exhibit 1 – DOE Implementation Unit Email dated April 14, 2025
Exhibit 2 – TDN dated June 14, 2024
4. I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct to the best of my knowledge, information, and belief.
5. I executed this document on June 27, 2025.

Dated: June 27, 2025

New York, New York

Respectfully submitted,

Liberty & Freedom Legal Group
Attorneys for Plaintiffs

By: /s/ Kenneth Willard
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